

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

HUBERT HAMILTON

*

Plaintiff

*

Case No.: _____

vs.

*

HOME DEPOT, U.S.A., INC.

*

Defendant

*

NOTICE OF REMOVAL

COMES NOW, Home Depot, U.S.A., Inc., Defendant, by and through its counsel, Matthew T. Angotti and Zachary S. Gilreath, pursuant to 28 U.S.C 1441, *et seq.* and hereby files the following Notice of Removal, and for good cause states as follows:

1. Plaintiff, Hubert Hamilton, has filed an action in the Circuit Court of Maryland for Prince George's County against Defendant Home Depot, U.S.A., Inc. alleging personal injury was caused by the negligence and breach of the implied warranty of merchantability of Defendant. A copy of all pleadings on file in the Circuit Court of Maryland for Prince George's County are attached hereto as Exhibit 1.

2. The case is removable to this court based on diversity jurisdiction because Plaintiff is a resident of Frederick County, Maryland and Defendant is a Delaware corporation with its principal office in Atlanta, Georgia. The amount in controversy exceeds \$75,000.00 as Plaintiff claims in excess of \$75,000.00 in damages.

3. Defendant was first served a copy of the Summons and Complaint on June 16, 2022.

WHEREFORE, Defendant, Home Depot U.S.A, Inc., hereby prays the action against it be removed to this court.

/s/ Matthew T. Angotti

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/s/ Zachary S. Gilreath

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Attorneys for Defendant Home Depot U.S.A., Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of July 2022, a copy of Defendant's Notice of Removal was eserved and/or mailed to:

Jeffrey R. Scholnick, Esq.
9515 Deerco Road, Ste. 407
Timonium, MD 21093
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Attorney for Plaintiff

/s/ Matthew T. Angotti

Matthew T. Angotti, (MD Bar No. 5949)